REMARKS

In the Notice of Panel Decision from Pre-Appeal Brief Review, the Panel maintained the rejections in the Final Office Action mailed May 4, 2007 ("Final Office Action") and indicated the application remaining under appeal. In the Final Office Action, the Examiner rejected claims 1 and 13-15 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,775,244 to Hattig ("Hattig").[1]

By the Amendment, Applicants amend claims 1 and 13-15. Claims 1 and 13-15 remain currently pending. Applicants respectfully traverse the Section 102(e) rejection of claims 1 and 13-15.

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." See M.P.E.P. § 2131, quoting Verdegaal Bros. v. Union Oil Co. of California, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). Further, "[t]he identical invention must be shown in as complete detail as is contained in the . . . claim." See M.P.E.P. § 2131, quoting Richardson v. Suzuki Motor Co., 868 F.2d 1126, 1236, 9 U.S.P.Q.2d 1913, 1920 (Fed. Cir. 1989).

Independent claim 1, as amended, recites a combination including, for example,

> a set membership assignment section configured to assign a relationship between a parent device and a child device, which is made when virtual connection is established on the first network in conformity with the serial interface standard, to each of the devices connected to the second network when the detection section detects a change in either the number of devices or the information; [and]
> a reset section configured to require reconstruction for

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[1] The Office Action contains a number of statements reflecting characterizations of the related art and the claims. Regardless of whether any such statement is identified herein, Applicants decline to automatically subscribe to any statement or characterization in the Office Action.

adding the devices connected to the second network to the first network, while the identification information is assigned by the assignment section to each of the devices connected to the second network and is formatted according to the first network

Hattig fails to disclose at least these features of amended claim 1.

Hattig discloses "a method for use on a bus that supports broadcast discovery. According to the method, identification information is received from a device on the bus and discovery information is obtained from the device using the identification information. The discovery information is then broadcast on the bus." Hattig, column 1, lines 25-30. "To discover devices connected to a specific bus, the solicit packet can specify a bus ID assigned to that bus. When devices on the network receive the solicit packet from a discovery device, they compare the ID of the bus to which they are connected with the bus ID in the solicit packet. If the two match, then the device responds to the solicit packet with the requested information, otherwise not." Hattig, column 3, lines 21-26, emphasis added.

Therefore, with reference to Fig. 1 of Hattig, devices 9, 10, 11, and 12 (bedroom 14) connected to bus 19 and device 15 (office 16) connected to bus 20 are connected to different buses and use different bus IDs. Thus, Hattig's teaching of discovery on separate buses does not constitute "a set membership assignment section configured to assign a relationship between a parent device and a child device, which is made when virtual connection is established on the first network in conformity with the serial interface standard, to each of the devices connected to the second network when the detection section detects a change in either the number of devices or the information," as recited in amended claim 1 (emphasis added).

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Further, in <u>Hattig</u>, "[t]o permit legacy devices to participate in 1394 bus transactions, <u>a proxy device may be connected to the network</u> to gather discovery information from legacy devices using the 'learn node ID then interrogate' protocol and then to broadcast the received discovery information in accordance with the broadcast discovery protocol to discovery devices that need the discovery information." <u>Hattig</u>, column 3, lines 41-47, emphasis added.

Thus, <u>Hattig's</u> proxy device simply relays the solicit packet from one bus to another bus without adding any device from one bus to another bus. In fact, <u>Hattig</u> explicitly states that "a solicit packet is issued by discovery device 40 on 1394 bus 41 for devices on bus 42. Devices on buses 41, 42 and 43 receive the solicit packet . . . . . Here, only devices on bus 42 respond." <u>Hattig</u>, column 4, lines 34-39. Therefore, <u>Hattig's</u> teaching of a proxy device for discovery over different buses does <u>not</u> constitute "a set membership assignment section configured to assign <u>a relationship between a parent device and a child device</u>," as recited in amended claim 1.

Moreover, in the Final Office Action, the Examiner does <u>not</u> address all above listed features of amended claim 1. <u>See</u> Final Office Action at 2-3. In the previous Office Action mailed October 18, 2006, the Examiner alleges that "Hattig teaches a network device according to claim 1, wherein the control section comprises a reset section (col. 2, lines 60-65) configured to require reconstruction that equipment connected to the second network is added to the first network in a state where there is caused a change in any one of the number of equipment connected to the second network and information on the equipment connected to the second network (col. 2, lines 25-33)." (Office Action of 10/18/06 at 3). Applicants respectfully disagree.

In the cited section, Hattig explicitly states that "[t]ypically, a bus reset occurs when a device on the bus is turned on or off, added to or removed from the bus, or when application software running on one of the devices (e.g., PC5) forces a bus reset, e.g., in response to a handling error." Hattig, column 2, lines 29-33. Therefore, Hattig's bus reset is simply for a single bus and devices connected to that single bus. Hattig's teaching of a single bus resetting thus does not constitute "a reset section configured to require reconstruction for adding the devices connected to the second network to the first network, while the identification information is assigned by the assignment section to each of the devices connected to the second network and is formatted according to the first network," as recited in amended claim 1 (emphasis added).

Furthermore, Hattig has no concept of "while the identification information is assigned by the assignment section to each of the devices connected to the second network and is formatted according to the first network," as recited in amended claim 1 (emphasis added). Hattig's mere mention of 1394 bus reset at most discloses an overall bus reset and cannot constitute the above features recited in amended claim 1.

Therefore, for at least the above reasons, Hattig clearly fails to disclose each and every element set forth in independent claim 1. Accordingly, the Section 102(e) rejection of claim 1 should be withdrawn and claim 1 should thus be allowable over Hattig. Further, independent claim 14, while of different scope, includes similar recitations to those of claim 1 and claim 14 should be also allowable for at least the reasons stated above with respect to claim 1. Because claim 13 depends from clam 1 and claim 15 depends from claim 14, claims 13 and 15 are also allowable at least due to their dependence.
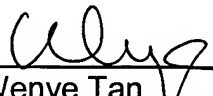
In view of the foregoing amendments and remarks, Applicants respectfully request reconsideration and reexamination of this application and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

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